

TITLE IV-E TRAINING GUIDELINES

Fiscal and Policy Requirements for IV-E Training Programs

Division of Children and Family Services

February 2001

TITLE IV-E TRAINING GUIDELINES

The purpose of this document is to provide practical guidelines for the operation of a training program under the Title IV-E Foster Care and Adoption Assistance Programs of the Social Security Act. Information contained in these guidelines has been drawn from various issuances of the U. S. Department of Health and Human Services. The source materials include the IV-E regulations at 45 CFR 1356.60(b) and (c), the training regulations at 45 CFR 235.61 and 235.63 through 235.66(a), the Department Appeals Board (DAB) decision number 1530 dated August 3, 1995, ACYF-PA-87-05 dated October 22, 1987, ACYF-PA-90-01 dated June 14, 1990, and ACF-IM-91-15 dated July 24, 1991.

The document provides direction for the use of IV-E funds for training staff providing public child welfare services. The document applies to training providers and employers of child welfare staff. The document is used with all Title IV-E training contracts issued by the Division of Children and Family Services (DCFS) and compliance with the requirements is expected under the training contracts.

The document was produced for DCFS by Maximus, with the research and writing done by Joe Kauzlarich.

For assistance from DCFS on the Title IV-E training guidelines, please contact:

John Tuohy
Phone 608-267-3832
Email tuohyjo@dhfs.state.wi.us

or Paul Minkus
Phone 608-266-8420
Email minkupm@dhfs.state.wi.us

CONTENTS:

I. Introduction	Page 2
II. Allowable Costs	Page 3
III. Other Requirements	Page 9
IV. Project Analysis Form	Page 11

I. INTRODUCTION

AUTHORITY FOR TITLE IV-E TRAINING

The authority for establishment of a Title IV-E training program and claiming reimbursement for such a program is cited at 45 CFR 1356.60(b). These regulations read as follows:

Federal matching funds for State and local training for foster care and adoption assistance under Title IV-E.

- (1) Federal financial participation is available at the rate of seventy-five percent (75%) in the costs of:
 - (i) Training personnel employed or preparing for employment by the State or local agency administering the plan, and;
 - (ii) Providing short-term training (including travel and per diem expenses) to current and prospective foster or adoptive parents and the members of state licensed or approved child care institutions providing care to foster and adopted children receiving Title IV-E assistance.
- (2) All training activities and costs funded under Title IV-E shall be included in the State Agency's training plan for Title IV-B.
- (3) Short and long term training at educational institutions and in-service training may be provided in accordance with the provisions of 235.63 through 235.66(a) of this title.

WHO CAN BE TRAINED

The regulations state that personnel employed or preparing for employment by the State or local agency administering the Title IV-E state plan may be trained and the cost of this training can be claimed for reimbursement at 75% under the IV-E program. This includes students preparing for employment in public child welfare, child welfare staff seeking academic degrees, and other training for the child welfare staff development. In addition short-term training may be provided to current and prospective foster or adoptive parents and the members of state licensed or approved child care institutions providing care to foster and adopted children receiving Title IV-E assistance. The regulations at 235.63(a) go on to state that training may be "provided personnel employed in all classes of positions, volunteers, and persons preparing for employment."

Training may be provided to individuals performing public child welfare activities as specified in 45 CFR 1356.60(c)(1) and (2) and whose activities are integral in the administration of the Title IV-E program. In general, this includes students preparing for employment in public child welfare and employees of agencies providing public child welfare services. The DCFS training contracts provide more specific direction on who can be trained with IV-E funds. Training costs applicable to any trainees who are not members of the above groups, or for activities which are not integral to the Title IV-E program, are not reimbursable under IV-E. Such training must be provided using other funding sources.

ENHANCED REIMBURSEMENT RATE FOR TRAINING

Under the IV-E training program, the state is reimbursed for eligible training expenditures at a 75% FFP rate. The enhanced 75% rate applies only to training expenses for public child welfare activities. Other administrative expenses associated with operation of the IV-E program, including the delivery of child welfare services and indirect costs associated with training programs are reimbursable at a 50% FFP rate. Training programs need to separate training costs from other costs and can claim the enhanced 75% rate only for eligible training expenses.

For all Title IV-E reimbursement, the amount of federal reimbursement is pro-rated by the proportion of IV-E eligible children served in out-of-home care, such as foster care and group homes. IV-E eligibility is based on children meeting economic and social deprivation factors tied to former AFDC program rules. DCFS computes the IV-E “penetration” rate and applies this rate to training contracts to determine the net amount of federal IV-E reimbursement. For example, if the IV-E penetration rate is 80%, then the net effective reimbursement rate for IV-E training would be $(80\% \times 75\%) = 60\%$.

WHO CAN PROVIDE MATCH

Under the IV-E training program, the state is reimbursed at the effective IV-E reimbursement rate based on total training expenditures. Thus to draw IV-E reimbursement, state or local matching expenditures must be provided. The match must come from non-federal sources and used only for the IV-E program.

Section 235.66(a) of the federal training regulations referenced in 1356.60(b) defines who can provide the match for Title IV-E training programs. The match cannot be private funds since the cited regulation does not include a reference to section 235.66(b). The funds used as match must be “appropriated directly to the State or local agency, or transferred from another public agency (including Indian tribes) to the State or local agency and under its administrative control, or certified by the contributing public agency as representing expenditures eligible for FFP” under the training program. Any funds used as match regardless of source can not also be used to match other federal funds and can not be federal funds themselves unless they are authorized by Federal law to be used to match other federal funds. The basic rule is that the same dollar of expenditure cannot be claimed under multiple programs.

In the case of the partnership training programs in Wisconsin, the match may be provided by the State, the county, tribes, or any other public entity in the state including public funded universities. The match must meet the other requirements of the regulations as well. The entity providing the match must provide a certification to the effect that the funds or expenditures being utilized as match are not federal funds and are not reported to the state in any CARS line (e.g., CARS lines 301, 682, or 683) being utilized by the state to claim federal funds under any other program regulations.

In the case of the university training partnerships, the counties and tribes who are members of the partnership pay an assessment/membership fee to the partnership that is used as match. These funds count as cash match when expended on training activities. In addition counties and tribes may appoint staff to various committees for the administration of the training partnership for whom the cost associated with meetings (attendee mileage and hourly salary cost) may be claimed as a training cost. In regard to actual training sessions, the registration fee and other costs of the attendees (such as mileage, per diem, salaries, fringe benefits, or any other reimbursable costs), may be allowable as a training cost depending on the type and duration of the training.

For any costs are paid by the county or tribe and utilized as training costs by the partnership, the paying entity must certify to the partnership that these expenditures were not paid from federal funds or reported to the state in any CARS line being utilized by the state to claim federal funds under any other program. In determining the salary and fringe benefit cost of staff attending training committee meetings or of trainees when the nature of the training allows the claiming of such costs, the training partnerships should use salary information from the employing agency.

II. ALLOWABLE TRAINING COSTS AND TOPICS

DEFINITION OF TERMS

In regard to the types of costs which may be claimed as training costs under Title IV-E, the training regulations cited at 235.64 and 235.65 define the types of costs dependent on for whom the cost is incurred, whether the training is provided inside or outside the agency, and the length of the training. To clearly comprehend the differences made in these sections the definitions contained in section 235.61 must be understood. These definitions are as follows:

Act means the Social Security Act, as amended.

A grant to an educational institution means payments to an educational institution for services rendered under a time limited agreement between the State agency and the eligible educational institution which provides for the training of State or local agency employees or persons preparing for employment with the State or local agency.

A training program is the method through which the State agency carries out a plan of educational and training activities to improve the operation of its programs.

Initial in-service training means a period of intensive, task-oriented training to prepare new employees to assume job responsibilities.

Continuing training means an ongoing program of training planned to enable employees to: (1) Reinforce their basic knowledge and develop the required skills for the performance of specific functions, and (2) acquire additional knowledge and skill to meet changes such as enactment of new legislation, development of new policies, or shifts in program emphasis.

Full-time training means training that requires employees to be relieved of all responsibility for performance of current work to participate in a training program.

Part-time training means training that allows employees to continue full time in their jobs or requires only partial reduction of work activities to participate in a training program outside of the State or local agency.

Long-term training means training for eight consecutive work weeks or longer.

Short-term training means training for less than eight consecutive work weeks.

FFP or Federal financial participation means the Federal government's share of expenditures made by a State or local agency under a training program.

Fringe benefits means the employer's share of premiums for industrial compensation, employee's retirement, unemployment compensation, health insurance, and similar expenses.

Persons preparing for employment means individuals who are not yet employed by the State or local agency, but who have received financial assistance from the State agency for training, and have made a legally binding commitment with the State or local agency for future employment under the conditions of these regulations.

Stipends means the basic living allowance paid to a student.

STAFF DEVELOPMENT OF PERSONNEL

In regard to staff development of personnel, 235.64(a) allows the following types of costs to be claimed:

- (a) Salaries, fringe benefits, travel and per diem for:
 - (1) Staff development personnel (including support staff) assigned full time to training functions and;
 - (2) Staff development personnel assigned part time to training functions to the extent time is spent performing such functions.

Time and effort records must be maintained for these staff to document the time associated with staff development if they are not assigned full time to the training function. As this section pertains to committees made up of partnership members established to assist in the administration of the partnership, sign in sheets should be maintained for each meeting showing the members name, round trip travel mileage, travel hours in quarter hours, and actual meeting hours in quarter hours. A copy of the minutes of the meeting should then be attached to the sign in sheet to document the nature of the meeting.

If the cost of these meetings (mileage reimbursement and salary cost) are to be claimed as training costs and the expenditure is made by the county/tribe, the paying entity must certify the expenditure was not from federal funds or reported to the state in any CARS line being utilized by the state to claim federal funds under any other program regulations.

AGENCY IN-SERVICE TRAINING

In regard to agency in-service training, 235.64(b) allows the following types of costs to be claimed:

- (b) For agency training sessions, FFP is available for:
 - (1) Salaries, fringe benefits, travel and per diem for employees in initial in-service training of at least one week;
 - (2) Travel and per diem for employees in agency training sessions away from the employee's work site, or in institutes, seminars or workshops related to the job and sponsored by professional organizations;
 - (3) Salaries, fringe benefits, travel and per diem for experts outside the agency engaged to develop or conduct special programs; and
 - (4) Costs of space, postage, teaching supplies, purchase or development of teaching material and equipment, and costs of maintaining and operating the agency library as an essential resource to the agency's training program.

It should be noted for agency in-service training sessions that salaries and fringe benefits can only be claimed on behalf of trainees when the training is for initial in-service training of **at least one week**. The in-service training can be for a more extended period. Initial in-service training may include not only new employees to the agency but also employees transferring to a new position within the agency for which initial in-service training is needed to assume the responsibilities of the new position. Initial in-service training may also include an On-the-Job-Training (OJT) component for the trainee to apply the skills learned in the classroom prior to assuming their own caseload. An initial in-service training program with an OJT component could be scheduled to alternate from one week to the next between the classroom and OJT.

Agency training sessions which providing training other than initial in-service training that meets the requirements specified above is eligible for IV-E reimbursement, but only at the IV-E administrative rate rather than the enhanced training rate.

If any of the allowable cost of these training sessions is paid directly by a county/tribe, the paying entity must certify the expenditure was not from federal funds or reported to the state in any CARS line being utilized by the state to claim federal funds under any other program regulations.

TRAINING AND EDUCATION OUTSIDE THE AGENCY

In regard to the costs to attend training and education programs provided outside of the agency (normally a university setting), 235.64(c) allows the following types of costs to be claimed:

- (c) For training and education outside of the agency, FFP is available for:
 - (1) Salaries, fringe benefits, dependency allowance, travel, tuition, books, and educational supplies for employees in full-time, long-term training programs (with no assigned agency duties);

- (2) Salaries, fringe benefits, travel, tuition, books, and educational supplies for employees in full-time, short-term training programs of four or more consecutive work weeks;
- (3) Travel, per diem, tuition, books and educational supplies for employees in short-term training programs of less than four consecutive work weeks, or part-time training programs; and
- (4) Stipends, travel, tuition, books and educational supplies for persons preparing for employment with the State or local agency.

It should be noted for training and education outside of the agency that salaries and fringe benefits can only be claimed on behalf of trainees when the training is full-time for **four or more consecutive weeks** and the trainee is relieved of all work responsibilities while in training. If the trainee carries a regular caseload while in training, then the salaries and fringe benefits cannot be counted as a training expense.

In addition if the training of employees is full-time, long-term of eight consecutive weeks or more, or if the training is for persons preparing for employment, the conditions as set forth in 235.63(b) must be met. Section 235.63(b) reads as follows:

- (b) When FFP is available. FFP is available for personnel employed and persons preparing for employment by the State or local agency provided the following conditions are met, and with the following limitations:
 - (1) Employees in full-time, long-term training make a commitment to work in the agency for a period of time equal to the period for which financial assistance is granted. A State agency may exempt an employee from fulfilling this commitment only if failure to continue in employment is due to death, disability, employment in a financial assistance program in a public assistance agency in another State, or other emergent circumstances determined by the single State agency head to be valid for exemption;
 - (2) An employee retains his or her rights and benefits in the agency while on full-time, long-term training leave;
 - (3) Persons preparing for employment are selected by the State agency and accepted by the school;
 - (4) Persons preparing for employment are pursuing educational programs approved by the State agency;
 - (5) Persons preparing for employment are committed to work for State or local agency for a period of time at least equal to the period for which financial assistance is granted if employment is offered within 2 months after training is completed;
 - (6) The State or local agency offers the individual preparing for employment a job upon completion of training unless precluded by merit system requirements, legislative budget cuts, position freezes, or other circumstances beyond the agency's control; and if unable to offer employment, releases the individual from his or her commitment;
 - (7) The State agency keeps a record of the employment of persons trained. If the persons are not employed by the State or local agency, the record specifies the reason for non-employment;
 - (8) The State agency evaluates the training programs; and
 - (9) Any recoupment of funds by the State from trainees failing to fulfil their commitment under this section shall be treated as a refund and deducted from total training costs for the purpose of determining net costs for FFP.

The institution providing the training is responsible for finding the trainee a placement in public child welfare following completion of the educational program. The trainee is responsible for working in the public child welfare field for a period equal to the length of the subsidized degree program. For example, if a trainee is subsidized for two years the trainee must make a commitment to work in public child welfare for at least two years.

If any of the allowable cost of these training sessions is paid directly by a county/tribe, the paying entity must certify the expenditure was not from federal funds or reported to the state in any CARS line being utilized by the state to claim federal funds under any other program regulations.

GRANTS TO EDUCATIONAL INSTITUTIONS

In regard to training grants to educational institutions, 235.64(d) allows the following types of costs to be claimed:

- (d) FFP is available for payments to educational institutions, as described in 235.63(c) for salaries, fringe benefits, and travel of instructors, clerical assistance, teaching materials and equipment.

In order for these payments to be reimbursable the conditions in 235.63(c) must be met as stated below:

- (c) Grants to educational institutions. FFP is available in payments for services rendered under grants to educational institutions provided all of the following conditions are met:
 - (1) Grants are made for the purpose of developing, expanding, or improving training for personnel employed by the State or local agency or preparing for employment by the State or local agency administering the program. Grants are made for an educational program (curriculum development, classroom instruction, field instruction, or any combination of these) that is directly related to the agency's program. Grants are made for not more than 3 years, but may be renewed, subject to the conditions of this section:
 - (2) Grants are made to educational institutions and programs that are accredited by the appropriate institutional accrediting body recognized by the U.S. Commissioner of Education. When a specialized program within the institution for which there is a specialized accrediting body is used, that program must be accredited by or have pre-accreditation status from that body. (Part 149 of this Title explains the requirements and procedures for obtaining recognition as an accrediting agency or association. Lists of currently recognized accrediting bodies are published in the **FEDERAL REGISTER** periodically. See also Nationally Recognized Accrediting Agencies and Associations published by the Office of Education);
 - (3) The State agency has written policies establishing conditions and procedures for such grants;
 - (4) Each grant describes objectives in terms of how the educational program is related to the financial assistance programs and how it is designed to meet the State or local agency's manpower needs; and
 - (5) An evaluation of the educational program funded by each grant is made no later than the close of the second year of the grant. The evaluation shall be conducted by representatives from the educational institution and the State agency to determine whether conditions and objectives described in the grant are being met. If the educational program does not meet these conditions and objectives, payment shall be terminated no later than the close of the second year of the grant.

The education institution providing the training is responsible for finding the trainee a placement in public child welfare following completion of the degree program. The trainee is responsible for working in the public child welfare field for a period equal to the length of the subsidized degree program. For example, if a trainee is subsidized for two years the trainee must make a commitment to work in public child welfare for at least two years.

COSTS NOT ALLOWABLE AS TRAINING COSTS

In regard to costs not allowable as training costs, 235.65 reads as follows:

235.65 Activities and costs not matchable as training expenditures.

FFP is not available for the following expenditures as training costs; however, the expenditures described in this section may be matched as administrative costs, if conditions for such matching are met:

- (a) Salaries of supervisors (day-to-day supervision of staff is not a training activity); and
- (b) Employment of students on a temporary basis, such as in the summertime.

The salary of a supervisor providing day-to-day supervision as a regular part of their job cannot be claimed as a training cost. However, the salary of a supervisor may be claimed as a training cost if they are performing a training function as part of a formalized training program, such as, within an OJT component of initial in-service training.

The regulations only allow for the claiming of the specific types of costs stated in the preceding sections. If the cost is not stated in these regulations it is not claimable at the enhanced 75% FFP rate. This does not preclude claiming the cost, if it is a support cost of the program, at the 50% FFP rate as a IV-E administrative cost. For example, indirect cost is not an allowable training cost at the 75% FFP rate because it is not specifically stated in the training regulation at 45 CFR 235.64 per DAB decision number 1530. However, per the same DAB decision, indirect cost applicable to training can be claimed as an administrative cost under IV-E at the 50% FFP rate.

ALLOWABLE TRAINING TOPICS

Until U.S. DHHS DAB decision 1530 was issued in August 1995, there were no written guidelines at the federal level that stated any requirements in regard to the topics for which training could take place utilizing IV-E training funds. Based on this DAB decision it is clear that for training to be claimable under the IV-E training program, the topic of the training must be one of the activities cited at 45 CFR 1356.60(c)(1) and (2) as allowable administrative activities under the IV-E program or at the least closely related to one of the activities. In general, the training topics must be related to the placement of children in out-of-home care. The specific activities cited are as follows:

- Eligibility determination and redetermination
- Fair hearings and appeals
- Rate setting
- Referral to services
- Preparation for and participation in judicial determinations
- Placement of the child
- Development of the case plan
- Case reviews
- Case management and supervision
- Recruitment and licensing of foster homes and institutions

The regulations at 1356.60(c)(3) go on to state that “Allowable administrative costs do not include the costs of social services provided to the child, the child’s family or foster family which provide counseling or treatment to ameliorate or remedy personal problems, behaviors or home conditions.” Based on this citation the DAB decision found that training directed at the development of the skills to provide these social services could not be claimed as an allowable cost under the IV-E training program. In addition the decision found that training provided to develop skills necessary to perform and document the child abuse and neglect investigation process are not allowable under IV-E training. In general, training directed at teaching the trainee how to directly provide services is not allowable under IV-E.

In determining whether a topic is allowable under the IV-E training program, the objective of the training should be taken into consideration along with the topic. For example: If the topic of the training is counseling services and the objective of the training is to provide the trainees with the skills to directly provide counseling to clients, then the training is not allowable under IV-E. However, if the topic of the training is counseling services but the objective of the training is to teach the trainees how to identify when counseling services are needed for a client in order to refer clients for services or when counseling is needed in developing the client’s case plan, then the training is allowable.

In the development of a training project a written description of the training should be prepared fully describing the objectives and the topical nature of the training. This description should then be evaluated in terms of the project's allowability under IV-E. A suggested format for this analysis is attached.

III. OTHER REQUIREMENTS FOR TRAINING PROGRAMS

COST ALLOCATION OF TRAINING COSTS

In ACYF-PA-90-01 dated June 14, 1990, the Policy Announcement states: "All training costs must be allocated to Title IV-E, State foster care and other State/Federal programs in such a manner as to assure that each participating program is charged its proportionate share of the costs. The allocations may be determined by case count of Title IV-E eligible children in relation to all children in foster care under the responsibility of the State Title IV-E/IV-B agency or on some other equitable basis." In general costs should only be charged to a program based on the benefits received by that program.

The preceding section noted that IV-E training should only be charged for topics that are applicable to the IV-E program. Any unallowable topics should not be charged to IV-E but should be charged to other state or federal programs. If a training project contains both allowable and unallowable topics then some reasonable method must be used to allocate the cost of the project between IV-E and other applicable programs. The method could use proportions of time devoted to allowable versus unallowable topics applied to the cost of the project, or if the amount of time devoted to each topic is approximately the same then the proportion of allowable topics versus unallowable topics could be applied to the cost. In some cases it may be possible to directly determine the cost of a topic because it is the only topic in the training project.

The Policy Announcement in conjunction with the DAB decision is not only saying that the topic must be allowable under IV-E but the benefit to IV-E must also be measured. These issuances are basically saying that not only are IV-E eligible clients receiving benefits from the new skills of the trainees but that ineligible clients are also receiving benefit. Even though the topic is allowable under IV-E, the IV-E program should only bear the costs of the training to the extent that the IV-E client population benefits from the training. The method used to measure the benefit to IV-E is to determine the proportion of IV-E eligible clients to total foster care clients and to apply this ratio (IV-E Penetration Rate) to the cost of allowable topics in calculating allowable IV-E costs reimbursable at the 75% FFP rate (50% in the case of indirect costs or other allowable administrative costs).

ACCOUNTING RECORDS

The accounting records for a training program must be maintained in such a manner that the cost of individual training projects may be determined. This requirement could be met by assigning a unique project number to each project (*including establishment of a General Administration Project for general administrative costs associated with multiple projects*) and include that identifier in every expenditure applicable to that project. The purpose for maintaining the accounting records in this manner is to ensure that the types of costs included in the records for each project are allowable based on the nature of the training. In the event that a federal audit is conducted on the training program the auditors would want to review individual projects for compliance both programmatically and fiscally.

DOCUMENTATION REQUIREMENTS

In developing a training program, the training needs of the trainee population should be taken into account to ensure training is provided in the areas where the need exists. Periodically a training needs assessment should be performed on the trainee population to identify the areas of need for the population in general and for each individual trainee. This information is gathered for development of future training projects as well as to track whether training is being received where the need was identified.

Detail registration records should be maintained for each training project. For each individual, the registration should identify the applicable training project, the dates of the training project, the full name of the trainee, the trainee's social security number or other unique trainee/student identification number, the name of agency/tribe of the trainee, and the registration fee paid including who paid the registration fee. In order for the registration fee to be used as match, the paying entity must certify the expenditure was not from federal funds or reported to the state in any CARS line being utilized by the state to claim federal funds under any other program regulations.

For each training project attendance records should be maintained in half-day increments to provide documentation for using trainee salaries and fringe benefits as match, and also to determine whether the trainee's attendance in the training project warrants full or partial credit for the training. The attendance sheet should include the trainee name, signature, social security number or other unique trainee/student identification number, agency/tribe of the trainee, the trainee's round trip travel mileage to attend the training, and the travel hours in quarter hours. If the travel mileage or hours are to be used as match, the paying entity must certify the expenditure was not from federal funds or reported to the state in any CARS line being utilized by the state to claim federal funds under any other program regulations.

For each individual trainee an historical record of training received should be maintained which should include the full name of the trainee, the trainee's social security number or other unique trainee/student identification number, the individual training projects attended along with the dates of the training, the credit units received by project, and the agency/tribe employing the trainee at the time of each training project.

CARS REPORTING

CARS reports should be filed by the training partnerships and other DCFS training contractors on a monthly basis during the contract period to ensure timely filing of claims by the Wisconsin Department of Health and Family Services to the U.S. Department of Health and Human Services for federal reimbursement. The CARS report should reflect expenditures for the month in the following four categories:

- The federal share of allowable IV-E training expenditures. This amount is calculated by multiplying allowable training expenditures (after consideration of types of costs and topics of the training) by the effective IV-E training FFP rate.

- The federal share of allowable IV-E administrative expenditures. This amount is calculated by multiplying allowable administrative expenditures (indirect cost) in support of the training program (after consideration of types of costs and topics of the training) by the effective IV-E administration FFP rate.

- The non-federal match share of allowable IV-E training expenditures. This amount is calculated by multiplying allowable training expenditures (after consideration of types of costs and topics of the training) by the effective training match rate (total costs less the IV-E training reimbursement).

- The non-federal share of allowable IV-E administrative expenditures. This amount is calculated by multiplying allowable administrative expenditures (such as indirect costs) in support of the training program (after consideration of types of costs and topics of the training) by the effective administration match rate (total costs less the IV-E administrative reimbursement).

RECORDS RETENTION

All training records including documentation of the training and the accounting records in support of the training should be retained for a period of no less than five years in the event of a federal or state audit.

**TRAINING PROJECT ANALYSIS
FOR DETERMINING TOPIC ALLOWABILITY
UNDER TITLE IV-E**

Title/Training Project Number _____

Description of the topic to be addressed

Objective of the training: Identify the functional activity/activities the training will assist the trainee in performing and the proportion of the training devoted to addressing this functional area (% percent of total training time devoted to each area)

Title IV-E Activities

- ☐ Eligibility determination and redetermination
- ☐ Fair hearings and appeals
- ☐ Rate setting
- ☐ Referral to services
- ☐ Preparation for and participation in judicial determinations
- ☐ Placement of the child
- ☐ Development of the case plan
- ☐ Case reviews
- ☐ Case management and supervision
- ☐ Recruitment and licensing of foster homes and institutions
- ☐ Closely related to above activity (specify how it is related)

Non-IV-E Activities

- ☐ Direct provision of social services (counseling, teaching parent skills, etc.)
- ☐ Performing a child abuse/neglect investigation and documenting the investigation
- ☐ Other (specify)

Total IV-E Proportion _____

Total Non-IV-E Proportion _____

Total **100%**

The Title IV-E proportion should be applied to the allowable types of cost of the project to determine the cost of the project chargeable to IV-E based on allowable topics prior to applying the IV-E penetration rate or the FFP rate.